

EXHIBIT H

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO, : PROMESA
as representative of : Title III
THE COMMONWEALTH OF PUERTO RICO *et al.*, : Case No. 17-BK-3283 (LTS)
Debtors.¹ : (Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO, : PROMESA
as representative of : Title III
PUERTO RICO ELECTRIC POWER AUTHORITY : **This document relates only to**
Debtor. : **Case No. 17-BK-4780 (LTS)**

¹ The Debtors in these Title III cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

PLEASE TAKE NOTICE that, pursuant to Rules 26 and 30 of the Federal Rules of Civil Procedure, made applicable to these proceedings pursuant to Rules 7026, 7030 and 9014 of the Federal Rules of Bankruptcy Procedure, the Official Committee of Unsecured Creditors of all Title III Debtors (other than COFINA) (the “Committee”) will take the deposition upon oral examination of the Puerto Rico Fiscal Agency and Financial Advisory Authority (“AAFAF”) on the topics referenced in the accompanying rider. These topics are in addition to those contained in the deposition notices previously served by the Committee pursuant to Fed. R. Civ. P. 30(b)(6). This deposition will commence on a date to be determined at the offices of Paul Hastings LLP, 200 Park Avenue, New York, NY 10166. The deposition will be taken pursuant to all applicable rules of the Court before a notary public or other such person authorized by law to administer oaths. The deposition will be recorded by stenographic means and video.

PURSUANT TO Fed. R. Civ. P. 30(b)(6), AAFAF must designate one or more officers, directors, or managing agents, or other persons who consent to testify on their behalf with respect to the matters set forth in the attached Schedule A. The Committee requests that at least ten days prior to the deposition, AAFAF identify the person(s) designated for each topic identified in Schedule A and produce all documents responsive to these topics, to the extent such documents have not already been produced.

[Remainder of page intentionally left blank.]

Dated: August 16, 2019
San Juan, Puerto Rico

/s/ Nicholas A. Bassett

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- and -

/s/ Juan J. Casillas Ayala

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SCHEDULE A: AAFAF 30(B)(6) RIDER

DEFINITIONS²

1. “AAFAF”, “You” or “Your” means and refers to Puerto Rico Fiscal Agency and Financial Advisory Authority and any of its affiliates, parents, subsidiaries, partners, associates, divisions, agencies, instrumentalities, departments, offices, officers, directors, shareholders, members, agents, attorneys, representatives, employees, predecessors or successors in interest and/or anyone acting on AAFAF’s behalf.
2. “BDO Puerto Rico” means and refers BDO Puerto Rico and any of its affiliates, parents, subsidiaries, partners, associates, divisions, departments, offices, officers, directors, shareholders, members, agents, attorneys, representatives, employees, predecessors or successors in interest and/or anyone acting on BDO Puerto Rico’s behalf, including any other advisors.
3. “PREPA” means and refers to the Puerto Rico Electric Power Authority and its governing board, and any of its affiliates, parents, subsidiaries, partners, associates, divisions, agencies, instrumentalities, departments, offices, officers, directors, shareholders, members, agents, attorneys, representatives, employees, predecessors or successors in interest and/or anyone acting on PREPA’s behalf.
4. “Communication” includes every manner of transmitting or receiving facts, information, opinions, or thoughts from one person to another person, whether orally, by documents, writing, e-mail, text message, web messaging, or any other form of instant messaging, or a copy thereof, and to words transmitted by telephone, radio, or any method of voice recording.

² Capitalized terms not otherwise defined herein shall have the meanings set forth in the Rule 9019 Motion.

5. RSA" means and refers to the *Definitive Restructuring Support Agreement*, dated as of May 3, 2019, among PREPA, AAFAF, the Oversight Board, and certain Supporting Holders, the exhibits and other materials attached to the RSA, and any and all amendments.

6. "Settlement" means and refers to all of the proposed settlements embodied within the RSA and the 9019 Motion.

7. "9019 Motion" means and refers to the *Joint Motion of Puerto Rico Electric Power Authority and AAFAF Pursuant to Bankruptcy Code Sections 362, 502, 922, and 928, and Bankruptcy Rules 3012(A)(I) and 9019 for Order Approving Settlements Embodied in the Restructuring Support Agreement and Tolling Certain Limitations Periods* [Docket No. 1235].

TOPICS OF EXAMINATION

1. The services that BDO Puerto Rico provides or has provided to PREPA, including without limitation accounting or financial consulting services, to the extent they may affect or otherwise relate to (i) the projections contained in PREPA's 2019 fiscal plan, (ii) the statements contained in the declarations of David Brownstein, Natalie Jaresko, and Frederic Chapados in support of the 9019 Motion, or (iii) any other purported justification, rationale, or fact proffered in support of the Settlement.